

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UGOCHUKWU GOODLUCK  
NWAUZOR, FERNANDO AGUIRRE-  
URBINA, individually and on behalf of all  
those similarly situated,

Plaintiffs,

v.

THE GEO GROUP, INC., a Florida  
corporation,

Defendant.

No. 3:17-cv-05769-RJB

DECLARATION OF JAMAL N.  
WHITEHEAD IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANT'S MOTIONS IN  
LIMINE

I, JAMAL N. WHITEHEAD, declare as follows:

1. I am over the age of eighteen, competent to testify in this matter, and do so  
based on personal knowledge.

2. Attached as Exhibit 1 is a true and correct copy of Plaintiffs' expert Jeffrey A.  
Munson, Ph.D.'s amended report dated February 6, 2020.

3. Attached as Exhibit 2 is a true and correct copy of a letter from my law  
partner Adam J. Berger to Defendant's counsel dated February 24, 2020, regarding the  
production of Dr. Munson's amended report and GEO's late-production of certain financial  
data.

1 I declare under penalty of perjury under the laws of the United States that the  
2 foregoing is true and correct.

3 DATED at Seattle, Washington this 23rd day of March, 2020.  
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5 s/ Jamal N. Whitehead  
6 JAMAL N. WHITEHEAD  
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